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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Samantha Regina Averill-Marcogliese,  Plaintiff,  v.  Kilolo Kijakazi, Acting Commissioner of Social Security,  Defendant.	}	Case No. 1:21-cv-00277-SKO  STIPULATION AND ORDER FOR EXTENSION OF TIME  (Doc. 12)
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IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from August 31, 2022 to October 31, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. In the months of May through July 21, 2022, Counsel has received an influx of Social Security Certified Administrative Records (CAR). A review of the records received shows

1 Counsel has received at least 50 CARs, the majority of which were filed in June  
2 2022.

3 Additionally, for the weeks of August 29, 2022 and September 5, 2022,  
4 Counsel currently has 15 merit briefs, and several letter briefs and reply briefs.  
5 Additional time is needed to thoroughly brief this matter for the Court.

6 Defendant does not oppose the requested extension. Counsel apologizes to  
7 the Defendant and Court for any inconvenience this may cause.

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9 Respectfully submitted,

10 Dated: August 18, 2022 PENA & BROMBERG, ATTORNEYS AT LAW  
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12 By: /s/ Jonathan Omar Pena  
13 JONATHAN OMAR PENA  
14 Attorneys for Plaintiff  
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16 Dated: August 18, 2022 PHILLIP A. TALBERT  
17 United States Attorney  
18 PETER K. THOMPSON  
19 Acting Regional Chief Counsel, Region IX  
20 Social Security Administration  
21

22 By: \*/s/ Caspar Chan  
23 Caspar Chan  
24 Special Assistant United States Attorney  
25 Attorneys for Defendant  
26 (\*As authorized by email on August 18, 2022)  
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**ORDER**

Based upon the foregoing stipulation of the parties (Doc. 12), and for good cause shown, Fed. R. Civ. P. 16(b)(4),

IT IS HEREBY ORDERED that Plaintiff shall have an extension of time, to and including October 31, 2022, in which to file Plaintiff's motion for summary judgment. All other deadlines set forth in the Scheduling Order (Doc. 9) shall be extended accordingly.

IT IS SO ORDERED.

Dated: August 19, 2022

/s/ Sheila K. Oberto  
UNITED STATES MAGISTRATE JUDGE